UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,))
Plaintiff,)
v.) Civil Action No. 4:11-cv-00077-RWS
AMEREN MISSOURI,)
Defendant.)))

JOINT PROPOSED AGENDA ITEMS FOR STATUS CONFERENCE

Pursuant to the Court's Order on May 22, 2014 (ECF No. 253), Plaintiff United States of America and Defendant Ameren Missouri (collectively, the "Parties"), hereby submit the proposed agenda items for discussion at the status conference set for June 25, 2014 at 10:30 a.m. CDT.

Parties Joint Proposed Agenda Items

1. Exchange of Privilege Logs.

United States' Proposed Agenda Items

- 1. Plaintiff's Motion to Compel Production of Chuck Naslund for Deposition and Motion for Leave to Take Six Additional Depositions (ECF No. 254);
- 2. Plaintiff's Motion to Compel Production of Documents of Ameren Employee James Bosch (ECF No. 238);
- 3. Plaintiff's Motion to Exclude Certain Opinions of Ameren Expert Marcus Caudill (ECF No. 260);

- 4. Ameren's denial of discovery on incentive-based compensation for improving unit performance; and
 - 5. Rule 26(e) supplementation of expert report of Dr. Ezra Hausman.

Ameren's Proposed Agenda Items

1. Request for Plaintiff's good faith memory-based search of all files of certain EPA custodians for documents pertaining to the could have accommodated provisions of the emission projection rule.

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Respectfully submitted on this 18th day of June, 2014.

s/Andrew C. Hanson

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Respectfully submitted on this 18th day of June, 2014.

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